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7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 VIVIAN WRIGHT-BOLTON;

CASE NO.: 2:14-cv-01612-APG-PAL

11 Plaintiff,

12 v.

13 MELANIE ANDRESS-TOBIASSON,
individually; THE ESTATE OF JENNIFER
14 BOLTON deceased; KOCKA & BOLTON,
LLC, a Nevada Limited Liability Company;

15 Defendants.
16 _____/

17 **STIPULATION AND ORDER TO EXTEND PLAINTIFF'S REPLY TO COUNTER-**
18 **MOTION PURSUANT TO RULE 56(d)**

19 IT IS HEREBY STIPULATED AND AGREED, by and between the Plaintiff, VIVIAN
20 WRIGHT-BOLTON, by and through her counsel, CAL J. POTTER, III, ESQ. and C. J.
21 POTTER, IV, ESQ. of POTTER LAW OFFICES and Defendant, MELANIE ANDRESS-
22 TOBIASSON, by and through her counsel WALTER R. CANNON, ESQ. and THOMAS D.
23 DILLARD, JR, ESQ. of OLSON CANNON GORMLEY & STOBERSKI that the date for
24 Plaintiff's to file her Reply to Defendant's Opposition to Counter-Motion Pursuant to Rule
25 56(d) [doc. 22] currently due Thursday, May 7, 2015 be extended two (2) weeks up to and
26 including Thursday, May 21, 2015.

27 Plaintiff submits that good cause exists for this extension as Plaintiff's counsel has been
28 unable to complete the Reply due to numerous court appearances, multiple depositions, and

1 other deadlines, including but not limited to Ninth Circuit and Nevada Supreme Court appeal
2 briefs. Based upon the foregoing, the parties request that this Court order the time for the
3 Plaintiff to file her Reply to Thursday, May 21, 2015.

4 This is the first request for enlargement of time is made in good faith and not for the
5 purposes of delay.

6
7 DATED this 7th day of May, 2015.

8 POTTER LAW OFFICES

9 By /s/ C. J. Potter, IV, Esq.

10 CAL J. POTTER, III, ESQ.

11 Nevada Bar No. 1988

12 C. J. POTTER, IV. ESQ.

13 Nevada Bar No. 13225

14 1125 Shadow Lane

15 Las Vegas, NV 89102

16 *Attorneys for Plaintiff*

DATED this 8th day of May, 2015.

OLSON, CANNON, GORMLEY,
ANGULO & STOBERSKI

By /s/ Thomas D. Dillard, Jr., Esq.

WALTER R. CANNON, ESQ.

Nevada Bar No. 1505

THOMAS D. DILLARD, JR., ESQ.

Nevada Bar No. 6270

9950 W. Cheyenne Avenue

Las Vegas, NV 89129

Attorney for Defendant Melanie

Andress-Tobiasson

17 **ORDER**

18 IT IS SO ORDERED.

19 May 11, 2015

20 DATED _____

21 
22 _____
23 U.S. DISTRICT COURT JUDGE
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